

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION**

**LEE ANNE DEAL and BRUCE
DEAL, Individually, and LEE ANNE
DEAL, as Administrator of the
ESTATE OF MADISON BAILEE
DEAL, Deceased,**

Plaintiffs,

v.

**CORECIVIC OF TENNESSEE, LLC,
CORECIVIC, INC., HAMILTON
COUNTY, TENNESSEE, CORRECT
CARE SOLUTIONS, LLC, PARVEEN
GILL, NEVA HUSKEY, JASON
KIRTON, ELIZA MALL, LINDA
MILES, AMBER ROY, PAGETT
VANHOOSER, and JOHN DOES,**

Defendants.

**Civil Action Number 1:17-CV-162
Judge Pamela L. Reeves
Magistrate Judge Christopher H. Steger
Jury Demand**

JOINT DISCOVERY REPORT

Pursuant to Federal Rule of Civil Procedure 26(f) and the Court's August 15, 2017 Scheduling Order (Docket Entry 23), Plaintiffs Bruce and Lee Anne Deal and Defendants CoreCivic of Tennessee, LLC, CoreCivic, Inc., Hamilton County, Tennessee, Correct Care Solutions, LLC, Parveen Gill, Neva Huskey, Jason Kirton, Eliza Mall, Linda Miles, Amber Roy, and Pagett VanHooser respectfully submit this Joint Discovery Report.

A. Completion of Federal Rule of Civil Procedure 26(f) Conference

On August 28, 2017, counsel for the parties conferred in accordance with Federal Rule of Civil Procedure 26(f) and the Court's August 15, 2017 Scheduling Order (Docket Entry 23).

B. Initial Disclosure Deadline

The parties will serve Initial Disclosures on or before September 7, 2017.

C. Subjects and Timing of Discovery

The parties anticipate that they will need to conduct discovery on the following topics: (1) Madison Bailee Deal's ("Deal") background; (2) Deal's incarceration at the Silverdale Detention Facility ("Silverdale"); (3) the access to medical treatment that Deal received during her incarceration at Silverdale; (4) the medical treatment that Deal received during her incarceration at Silverdale; (5) the cause of Deal's death; (6) policies, customs, and training of Defendants; (7) the allegations and issues raised in the pleadings, including the bases for Plaintiffs' causes of action and the bases for Defendants' defenses; and (8) any other topics that become pertinent based upon the discovery that is conducted in this matter. The Court established a discovery deadline in this matter of ninety days before trial (Docket Entry 23).

D. Electronically Stored Information

The parties have discussed discovery of electronically stored information ("ESI") and specifically the requirements that are outlined in paragraph 2(d) of the Scheduling Order. The parties have discussed the documents that likely will be needed in this lawsuit and have reached general agreements regarding how e-discovery, the preservation of documents, and the exchange of documents will be conducted in this case. The parties agree that they will take reasonable efforts to preserve the documents and materials that they reasonably believe will be relevant to the underlying claims and defenses in this lawsuit.

E. Privileged Information and Work Product

The parties have discussed the extent to which they anticipate asserting any claims under the attorney-client privilege or the work product doctrine. At this time, the parties do not request any particular order or other direct involvement by the Court on this issue.

F. Limitations on Discovery

At this time, the parties do not request any changes to the limitations on discovery mandated by the Federal Rules of Civil Procedure.

G. Other Orders

The parties do not believe any other orders need to be entered at this time under Federal Rules of Civil Procedure 16(c) or 26(c).

H. Settlement

At this time, the parties believe that a settlement of this matter is unknown.

I. Length of Trial

The parties anticipate that trial will last five to seven days.

Respectfully submitted,

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